

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>Debra Finan</b>	:	
	:	
	:	<b>Debtor</b>
	:	<b>Chapter 13</b>
	:	
<b>Debra Finan</b>	:	<b>Bankruptcy No. 19-13496 AMC</b>
	:	
<b>v.</b>	:	
	:	
<b>Wells Fargo Bank, N.A.</b>	:	
	:	<b>Respondent</b>
	:	
	:	
	:	
	:	

**RESPONSE OF WELLS FARGO BANK, N.A. TO EXPEDITED MOTION FOR  
AUTHORITY TO SELL REAL PROPERTY FREE AND  
CLEAR OF LIENS AND ENCUMBRANCES**

Respondent, Wells Fargo Bank, N.A., by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
5. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
6. Admitted.

7. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment..
8. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
9. Admitted.
10. Conclusion of law.

**WHEREFORE**, Respondent, Wells Fargo Bank, N.A. respectfully requests that this Honorable Court deny EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND ENCUMBRANCES in its entirety without the following provision:

- 1) Debtor shall include in the Order that either Wells Fargo Bank, N.A. will be paid in full subject to a proper payoff quote at the time of closing or that any sale short of full payoff will be subject to Wells Fargo Bank, N.A.'s final approval.
- 2) Closing is required within 30 days of the payoff quote date or a new payoff is required within 30 days of closing.

Respectfully submitted,

Date: May 20, 2020

/s/ Jerome Blank, Esquire  
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